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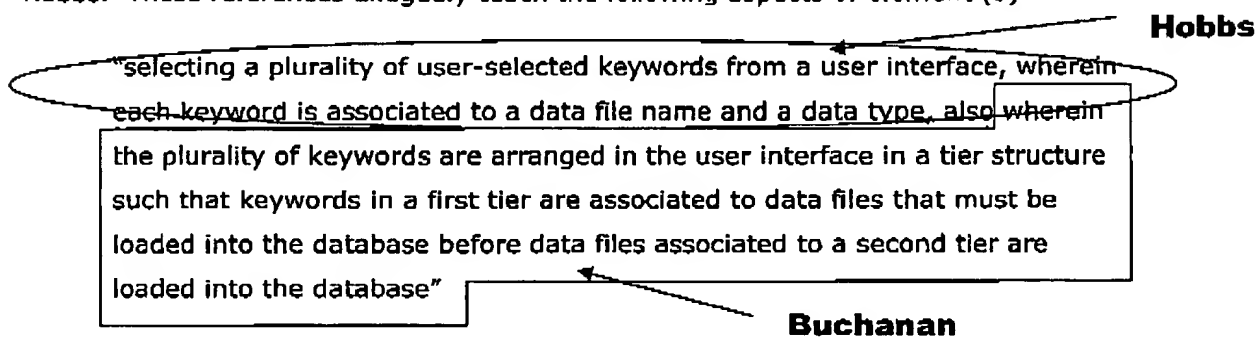
II. Remarks

Claims 19-33 are pending. For at least the reasons stated below, Applicants assert that all claims are in condition for allowance. Claims 19, 21, 24, 26, 29 and 31 are rejected under 35 U.S.C. § 103 as being unpatentable over *Buchanan* (US Patent 5,267,155) in view of *Edwards* (US Patent 5,410,551) in view of *Hobbs* (US Patent 6,523,022) in view of *Lee* (US Patent 6,535,883). Applicants respectfully oppose these rejections.

The present Office action rejects the claims using the same set of references as were previously used to reject the claims, namely: *Buchanan* (US Patent 5,267,155) in view of *Edwards* (US Patent 5,410,551) in view of *Hobbs* (US Patent 6,523,022) in view of *Lee* (US Patent 6,535,883). In their last response, applicants amended the independent claims. Among the amendments is a new element (b), which recites:

"selecting a plurality of user-selected keywords from a user interface, wherein each keyword is associated to a data file name and a data type, also wherein the plurality of keywords are arranged in the user interface in a tier structure such that keywords in a first tier are associated to data files that must be loaded into the database before data files associated to a second tier are loaded into the database"

The Office action rejects this new element (b) by a combination of *Buchanan* and *Hobbs*. These references allegedly teach the following aspects of element (b):



Applicants respectfully assert that *Hobbs* does not teach or suggest the first portion of element (b), *Buchanan* does not teach or suggest the second portion of element (b), and furthermore one skilled in the art would not combine *Hobbs* and *Buchanan* to build element (b).

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A. Hobbs does not teach or suggest the first portion of element (b)

The Office action asserts that Hobbs teaches "selecting a plurality of user-selected keywords from a user interface, wherein each keyword is associated to a data file name and a data type" in column 17, lines 17-54, where "Linked Term phrases are assigned symbols and associated file names" (Office action page 5).

Hobbs does not teach "user-selected keywords". Applicants' invention enables the user who is using the GUI to perform a series of data loads to set up customized keywords for the various files that are to be loaded. These keywords are "user-selected", meaning that the user can pick any string as a keyword. The user then associates each keyword to one or more "user input data files" (preamble). In other words, the user may choose to use the keyword "BillingRecords" and then "user input" the associated data file REC039281_BILLED01052005.DAT to this keyword. By choosing her own key words, the data load operator can choose words that make the most sense to her and which are easier to understand than lengthy file names that they are associated with.

Hobbs does not allow "user-selected keywords". In Hobbs, the symbol/keywords are arguments that are added to a CGI request. As the example in column 17 discusses, the user who is using the GUI may be reading an article that has the term "AUTOMOTIVE-RELATED INDUSTRY" set up as a hyperlink. When the user clicks on this link, the client computer uses the argument "AR1" within the CGI request, which looks like this (see, figure 5):

<http://www.example.com/datasite.pl?AR1>

**Keyword /
argument**

The end user has no power over choosing what string the keyword will be formed from. The user simply clicks on the hyperlink and behind the scenes, the keyword/symbol AR1 is appended to the CGI request. Therefore, Hobbs does not teach or suggest using "user-selected keywords".

B. Buchanan does not teach or suggest the second portion of element (b)

The Office action asserts that Buchanan teaches "wherein the plurality of keywords are arranged in the user interface in a tier structure such that keywords in a first tier are associated to data files that must be loaded into the database before data files associated to a second tier are loaded into the database" in column 14, lines 5-15 as well as figures 1, 2A

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and 2B, where "once a user has defined and selected a desired document template, in particular order, the template is stored on the electronic storage device" (Office action page 3).

Taken in its full context, this portion of Buchanan discusses how to select "several previously defined document templates to form a new document template" (column 13, lines 60-62). For example, it "may be desirable to generate a complete patient report including several separate reports" (column 13, lines 63-64). While building this new document template, the user "can defined the order in which each document template will appear in multiple document template definition" (column 14, lines 5-7). There is no teaching that the various documents that make up the new document template are displayed on the GUI, let alone displayed in a tier structure, and let alone where "keywords in the first tier are associated to data files that must be loaded into the database before data files associated to a second tier are loaded into the database".

Applicants assert that generating a large document template by combining several smaller, pre-existing document templates, is not relevant to and neither teaches nor suggests how build a "data load" system that includes "error and summary reports", and in which the user select "a plurality of user-selected keywords" from the GUI, such that these keywords are "associated to a data file name and a data type", and where the keywords "are arranged in the user interface" GUI "in a tier structure such that keywords in the first tier are associated to data files that must be loaded into the database before data files associated to a second tier are loaded into the database", as required by the claims.

C. One would not combine Hobbs and Buchanan to build element (b)

The Office action states that one skilled in the art would have combined Hobbs and Buchanan with the "motivation of connecting linked terms to database records or templates, thereby saving enormous labor and time cost involved in updating a database." Applicants disagree. As discussed above, Hobbs teaches how to append keyword arguments, such as "AR1" to CGI requests. Buchanan teaches building a new document templates by combining several pre-existing document templates. Neither of these technologies would be reasonably combined. Even if they were combined, the person skilled in the art would not produce from such a combination a system that enables users to select "user-selected keywords from a user interface" where each of these user-selected keywords "is associated to a data file name and a data type", and in which each of the user-selected keywords "are

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arranged in the user interface" in a manner to show "a tier structure such that keywords in a first tier are associated to data files that must be loaded into the database before data files associated to a second tier are loaded into the database".

For at least these reasons, Applicants assert that the Hobbs and Buchanan references cannot be combined to teach the limitations in element (b) of the independent claims. As was discussed in Applicants' prior response, figure 2 of the specification (a copy of which is attached as the final page of this response) shows an example. On the left side of the figure, a client PC has data files stored in it. The user interface is circled on the left side of the figure. The first three data files in tier one are shown in the user interface. Each data file is assigned a keyword to describe the file or for use as a mnemonic device. The user interface also displays a type for each data file. A checkbox field in front of each keyword allows the user to select the desired keywords, thereby selecting the desired data files. The system ensures that data files from one tier must be loaded before those selected in a higher tier. The cited references don't teach or suggest such a GUI interface.

Because the Lee, Buchanan, Edwards and Hobbs references fail to teach or suggest all of the limitations in the independent claims, the Examiner has failed to provide a *prima facie* case of obviousness. Applicants ask that the rejections to claims 19-33 be withdrawn and a Notice of Allowance be issued.

D. Summary

Applicants submit that all pending claims are allowable over the art of record and respectfully requests that a Notice of Allowance be issued in this case. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at 612-607-7508.

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If any fees are due in connection with the filing of this paper, then the Commissioner is authorized to charge such fees, including fees for any extension of time, to Deposit Account No. 50-1901 (Docket 060021-340501).

Respectfully submitted,



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